



Firouzeh Nur-Vaccaro

Attorney at Law

firouzehnurvaccaro@kimiplawgroup.com

Direct. 856.520.8038 | www.kimintellectualproperty.com

129 W. Evesham Road | Voorhees, NJ 08043

February 14, 2025

VIA EMAIL ONLY

Clerk of Court
U.S. District Court for the District of New Jersey
Mitchell H. Cohen Building & United States Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: NORTHERN DIVERS USA, INC. v. ATLANTIC SUBSEA, INC. et al
Civil Action No. 1:24-cv-08279-KMW-EAP - Adjournment of the Motion Day
pursuant to Local Rule 7.1(d)(5)

Dear Clerk of Court:

We represent Plaintiff Northern Divers USA, Inc. (“Plaintiff” or “Northern Divers”) in the above-referenced action.

On February 7, 2025, Defendant Xylem Dewatering Solutions, Inc. filed a Motion to Dismiss Plaintiff’s Complaint, and in the Alternative, to Stay (“Motion to Dismiss”). The Motion Day for the Motion to Dismiss is March 3, 2025, and Plaintiff Northern Divers’ Opposition is due February 18, 2025.

We hereby make an application for the adjournment of the Motion Day pursuant to Local Rule 7.1(d)(5). With the adjournment, the new Motion Day will be March 17, 2025, and Plaintiff’s Opposition will be due March 3, 2025.

The originally noticed motion day has not previously been extended or adjourned.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Firouzeh Nur-Vaccaro', written over a horizontal line.

Firouzeh Nur-Vaccaro



Clerk of Court
February 14, 2025
Page 2

ORDER

The above application is hereby ORDERED GRANTED.

The new Motion Day for the Motion to Dismiss is MARCH 17, 2025

ORDER DATED: _____, 2025

MELISSA E. RHOADS, Clerk

By: _____
Deputy Clerk